

**EXHIBIT B**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**DREW J. RIBAR,**

Plaintiff,

v.

**STATE OF NEVADA ex rel. NEVADA DEPARTMENT OF CORRECTIONS, et al.,**

Defendants.

**Case No.: 3:24-cv-00103-ART-CLB**

**EXHIBIT B: BODY CAMERA AUDIO RECORDING AND TRANSCRIPT OF DEPUTY  
SEAN PALAMAR, AUGUST 30, 2022**

**Summary Judgment Relevance**

This exhibit provides undisputed material evidence under **Fed. R. Civ. P. 56(a)**, demonstrating that no genuine issue of material fact exists regarding Defendants' violations of Plaintiff's rights under:

- **U.S. Constitution:** Amendments **I, IV, VIII, XIV**
- **Nevada Constitution:** Article 1, §§ **1, 6, 8, 9, 18**
- **42 U.S.C. § 1983** (civil rights violations)

PLEADING TITLE - 1

- 1 • **18 U.S.C. §§ 241-242** (conspiracy and deprivation of rights)
- 2 • **Nevada Revised Statutes (NRS):**
  - 3 ○ NRS 171.1233 (Recording interference)
  - 4 ○ NRS 197.200 (Oppression)
  - 5 ○ NRS 199.310 (Malicious prosecution)
  - 6 ○ NRS 200.460 (False imprisonment)
  - 7 ○ NRS 200.310 (Kidnapping)
  - 8 ○ NRS 200.481 (Battery)
  - 9 ○ NRS 200.471 (Assault)
  - 10 ○ NRS 207.190 (Coercion)
  - 11 ○ NRS 205.2715 (Unlawful taking)
  - 12 ○ NRS 205.220 (Grand larceny)

13 This evidence proves:

- 14 1. **Retaliatory interference** with Plaintiff's lawful recording.
- 15 2. **Unlawful arrest and seizure** without probable cause.
- 16 3. **Cruel conditions** post-arrest violating the Eighth Amendment.
- 17 4. **Due process violations** through falsified charges.
- 18 5. **Coordinated misconduct and oppression** under *Monell* liability.
- 19 6. **Municipal liability** under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978).

20 These violations contradict clearly established law (*Fordyce v. Seattle*, 55 F.3d 436 (9th Cir.  
21 1995); *Irizarry v. Yehia*, 38 F.4th 1282 (10th Cir. 2022)), negating any claim of qualified  
22 immunity and entitling Plaintiff to judgment as a matter of law.

23 PLEADING TITLE - 2

## Exhibit Description

This exhibit comprises:

1. A **digital audio recording** in .MOV format from Deputy Sean Palamar's body camera, obtained through discovery, recorded on August 30, 2022, at **Northern Nevada Correctional Center (NNCC), Carson City, Nevada**, lasting 19 minutes and 15 seconds, capturing Defendants' actions during Plaintiff's arrest.
2. A **35-page PDF transcript** of the audio, generated using **DaVinci Resolve software**, with timestamps aligned to the recorded events.

Both the .MOV file and PDF transcript are **submitted manually on a USB drive** to the court clerk, in compliance with **Local Rule IC 2-2**, with an accompanying **Notice of Manual Filing**.

## Key Legal Violations and Supporting Evidence

Time Stamp	Incident Summary (Transcript Lines)	Legal Relevance
01:00:29 -	Officer states Plaintiff was "recording doing that First Amendment right shit" (Lines 2-5).	<b>First Amendment retaliation</b> ( <i>Fordyce v. Seattle, Glik v. Cunniffe, Irizarry v. Yehia</i> ); <b>NRS 171.1233</b> (interference with recording); <i>Monell</i> policy of suppressing recordings.
01:00:41		

Time Stamp	Incident Summary (Transcript Lines)	Legal Relevance
01:01:06 - 01:02:14	Smith escalates: "I've identified deputies they're gonna come" (Line 25); Frazier orders arrest (01:04:07, Line 92).	<b>Conspiracy</b> ( <i>Ashcroft v. Iqbal</i> , 556 U.S. 662 (2009)); <b>NRS 197.200</b> (oppression); <b>NRS 207.190</b> (coercion); <i>Monell</i> policy of retaliation.
01:01:28 - 01:01:46	Smith admits "no trespassing signs up" and "this is a public roadway" (Lines 37-46).	<b>Fourth Amendment violation</b> ( <i>Hiibel v. Sixth Judicial Dist. Ct., Devenpeck v. Alford</i> ); <b>NRS 200.460</b> (false imprisonment); <b>NRS 199.310</b> (malicious prosecution).
01:05:42 - 01:06:32	Palamar shuts off camera despite plea "Please leave my cameras running" (Lines 142-146), plans truck tow (Line 165).	<b>First Amendment retaliation</b> ( <b>NRS 171.1233</b> ); <b>Eighth Amendment violation</b> (95°F heat, Exhibit A, Lines 554-556, Line 403); <i>Monell</i> custom of device seizure.
01:12:42 - 01:18:33	Deputies add "obstructing" (Line 239) and "failure to identify" (Line 417); Smith admits "I did not ask him for his name" (Line 425).	<b>Due process violation</b> ( <i>Iqbal, Irizarry</i> ); <b>NRS 199.310</b> (malicious prosecution); falsification supports <i>Monell</i> liability.

#### Authentication



1 Pursuant to **Fed. R. Evid. 901 and 1002**, and under **28 U.S.C. § 1746**, I, **Drew J. Ribar**, declare  
2 **under penalty of perjury under the laws of the United States** that:

- 3
- 4 • The **.MOV audio recording**, obtained through discovery from Deputy Sean Palamar's
- 5 body camera, is a **true and accurate depiction** of events on August 30, 2022, at NNCC.
- 6 • The **35-page PDF transcript**, generated using **DaVinci Resolve**, accurately reflects the
- 7 **audio recording**.
- 8

9 Both are **submitted manually on a USB drive** to the court clerk, in compliance with **Local**  
10 **Rule IC 2-2**, with an accompanying **Notice of Manual Filing**.  
11

12

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13

14 **DATED: March 28, 2025**

15

16 **/s/ Drew J. Ribar**

17 **Drew J. Ribar, Pro Se**

18 3480 Pershing Ln.

19 Washoe Valley, NV 89704

20 775-223-7899

21 Const2Audit@gmail.com

22

23

24

25

26

27

28

WEBVTT

1

01:00:29.291 --> 01:00:32.333

<b>[BLANK\_AUDIO]</b>

2

01:00:35.291 --> 01:00:38.541

<b>My perimeter officers let me know this</b>

3

01:00:38.541 --> 01:00:39.833

<b>guy pulled over here and</b>

4

01:00:39.833 --> 01:00:41.041

<b>started recording doing that first</b>

5

01:00:41.041 --> 01:00:41.666

<b>amendment right shit.</b>

6

01:00:43.291 --> 01:00:43.750

<b>Good.</b>

7

01:00:45.500 --> 01:00:46.166

<b>Where's he at now?</b>

8

01:00:46.333 --> 01:00:46.916

<b>He's still in charge.</b>

9

01:00:47.583 --> 01:00:48.625

<b>[INAUDIBLE]</b>

10

01:00:51.291 --> 01:00:52.000

<b>Will do sir.</b>

11

01:00:54.291 --> 01:00:55.625

<b>That was my award and if you guys create</b>

12

01:00:55.625 --> 01:00:56.291

<b>a case number I need to come.</b>

13

01:00:56.291 --> 01:00:57.416

<b>[INAUDIBLE]</b>

14

01:00:57.416 --> 01:01:02.041

<b>He's on foot.</b>

15

01:01:02.041 --> 01:01:03.000

<b>He parked his truck here.</b>

16

01:01:03.000 --> 01:01:05.125

<b>There's no parking signs right here.</b>

17

01:01:06.041 --> 01:01:06.958

<b>Did you guys contact him at all?</b>

18

01:01:06.958 --> 01:01:07.291

<b>I did.</b>

19

01:01:07.291 --> 01:01:08.041

<b>I tried talking to him.</b>

20

01:01:08.041 --> 01:01:09.041

<b>I was like we're not gonna let you on the</b>

21

01:01:09.041 --> 01:01:09.750

<b>state property so</b>

22

01:01:09.750 --> 01:01:10.666

<b>you're gonna impede my right.</b>

23

01:01:10.666 --> 01:01:12.250

<b>I was like I've just let you know I've</b>

24

01:01:12.250 --> 01:01:12.875

<b>identified deputies</b>

25

01:01:12.875 --> 01:01:13.666

<b>they're gonna come here.</b>

26

01:01:13.916 --> 01:01:14.833

<b>What did he say is did</b>

27

01:01:14.833 --> 01:01:15.708

<b>he give a reason at all?</b>

28

01:01:15.916 --> 01:01:16.750

<b>He just excited in his</b>

29

01:01:16.750 --> 01:01:17.500

<b>first amendment rights.</b>

30

01:01:17.833 --> 01:01:18.541

<b>Just okay.</b>

31

01:01:19.291 --> 01:01:20.791

<b>I had to walk down my whole yard.</b>

32

01:01:20.791 --> 01:01:21.916

<b>My camps locked down.</b>

33

01:01:21.916 --> 01:01:23.458

<b>We had to go in the community and pull</b>

34

01:01:23.458 --> 01:01:24.250

<b>the inmates off the community</b>

35

01:01:24.250 --> 01:01:25.291

<b>in cases in the tent to escape.</b>

36

01:01:25.291 --> 01:01:27.916

<b>So it's a big fiasco for us.</b>

37

01:01:28.166 --> 01:01:30.291

<b>We don't have any no trespassing signs up</b>

38

01:01:30.291 --> 01:01:31.583

<b>obviously because we got--</b>

39

01:01:31.875 --> 01:01:33.750

<b>As far as the prison property goes I mean</b>

40

01:01:33.750 --> 01:01:35.250

<b>you guys have discretion to have people</b>

41

01:01:35.250 --> 01:01:36.333  
<b>leave when it comes to--</b>

42

01:01:36.708 --> 01:01:36.875  
<b>100%.</b>

43

01:01:37.333 --> 01:01:37.583  
<b>Yeah.</b>

44

01:01:38.125 --> 01:01:40.875  
<b>So he said this is a public roadway which</b>

45

01:01:40.875 --> 01:01:42.333  
<b>in fact it is a public roadway because we</b>

46

01:01:42.333 --> 01:01:43.625  
<b>got visitors coming and going obviously.</b>

47

01:01:44.000 --> 01:01:44.250  
<b>Yes.</b>

48

01:01:44.250 --> 01:01:45.750  
<b>But when it comes down to it like I asked</b>

49

01:01:45.750 --> 01:01:46.958  
<b>him I was like are you here for a visit?</b>

50

01:01:46.958 --> 01:01:48.708  
<b>He said I don't know the process I said</b>

51

01:01:48.708 --> 01:01:49.500  
<b>you need a visiting form.</b>

52

01:01:49.500 --> 01:01:50.583  
<b>You can get those from an offender can</b>

53

01:01:50.583 --> 01:01:52.166  
<b>send them to you or you can get them from</b>

54

01:01:52.166 --> 01:01:53.750



<b>our main building over here at 5500.</b>

55

01:01:54.541 --> 01:01:55.916

<b>And he said well I need to go</b>

56

01:01:55.916 --> 01:01:56.750

<b>down there and figure it out.</b>

57

01:01:56.750 --> 01:01:57.333

<b>I said you were not</b>

58

01:01:57.333 --> 01:01:58.041

<b>allowed in any buildings?</b>

59

01:01:58.416 --> 01:01:59.250

<b>He said you're going to impede my way?</b>

60

01:01:59.250 --> 01:02:00.416

<b>I said no I'm not.</b>

61

01:02:01.333 --> 01:02:02.791

<b>But I'm also I also don't know where--</b>

62

01:02:03.875 --> 01:02:04.250

<b>Because this is the first</b>

63

01:02:04.250 --> 01:02:05.250

<b>time we've encountered it.</b>

64

01:02:05.250 --> 01:02:06.208

<b>So I don't know where</b>

65

01:02:06.208 --> 01:02:07.541

<b>what our options are.</b>

66

01:02:07.541 --> 01:02:08.125

<b>We want gone.</b>

67

01:02:09.250 --> 01:02:10.666

<b>Well it's a prison I</b>

68

01:02:10.666 --> 01:02:12.791  
<b>mean if you're not here--</b>

69

01:02:12.791 --> 01:02:13.333  
<b>You guys can trespass</b>

70

01:02:13.333 --> 01:02:14.250  
<b>them from the property.</b>

71

01:02:14.541 --> 01:02:14.750  
<b>Easily.</b>

72

01:02:14.750 --> 01:02:16.833  
<b>No we I mean me I'm the</b>

73

01:02:16.833 --> 01:02:17.708  
<b>shift sergeant right now.</b>

74

01:02:17.958 --> 01:02:18.666  
<b>100% one of them also.</b>

75

01:02:18.666 --> 01:02:19.958  
<b>I'm going to be live in 13 school.</b>

76

01:02:19.958 --> 01:02:21.291  
<b>I'm going to pass back to you.</b>

77

01:02:22.291 --> 01:02:24.333  
<b>Good morning videos of license</b>

78

01:02:24.333 --> 01:02:26.125  
<b>plates and vehicle mounts up.</b>

79

01:02:26.125 --> 01:02:26.333  
<b>Okay.</b>

80

01:02:36.291 --> 01:02:37.458  
<b>That's nice.</b>

81

01:02:39.291 --> 01:02:41.708

<b>5-0-1.</b>

82

01:02:43.583 --> 01:02:44.791

<b>Sounds like the subject's trying to do</b>

83

01:02:44.791 --> 01:02:46.041

<b>some sort of first thing.</b>

84

01:02:46.333 --> 01:02:48.166

<b>Maybe just have a similar idea.</b>

85

01:02:48.916 --> 01:02:50.375

<b>But we'll try to make contact with him.</b>

86

01:02:50.375 --> 01:02:52.083

<b>He's a prison partner and</b>

87

01:02:52.083 --> 01:02:54.416

<b>then record pictures of him.</b>

88

01:03:02.291 --> 01:03:04.291

<b>10-4-break 34.95.</b>

89

01:03:16.291 --> 01:03:19.291

<b>34.95.</b>

90

01:03:46.291 --> 01:03:47.125

<b>Thank you very much.</b>

91

01:03:49.166 --> 01:03:58.583

<b>Sir what is your name?</b>

92

01:04:05.916 --> 01:04:07.333

<b>The facility is on lockdown.</b>

93

01:04:07.333 --> 01:04:08.041

<b>Yes it is.</b>

94

01:04:08.041 --> 01:04:09.125

<b>This is a company operation.</b>

95

01:04:09.125 --> 01:04:10.166

<b>This is a disruptive operation.</b>

96

01:04:10.541 --> 01:04:11.416

<b>Sir what is your name?</b>

97

01:04:12.708 --> 01:04:13.250

<b>Put that down.</b>

98

01:04:13.416 --> 01:04:14.166

<b>Put your hands behind your back.</b>

99

01:04:14.500 --> 01:04:14.708

<b>Okay.</b>

100

01:04:15.625 --> 01:04:17.666

<b>I'm not going to risk</b>

101

01:04:17.666 --> 01:04:21.833

<b>this to you guys at all.</b>

102

01:04:21.833 --> 01:04:26.000

<b>No you may not.</b>

103

01:04:26.000 --> 01:04:27.125

<b>Right now you have the right to remain</b>

104

01:04:27.125 --> 01:04:28.416

<b>silent or anything you say you can to</b>

105

01:04:28.416 --> 01:04:29.458

<b>maybe use it again to an accord.</b>

106

01:04:29.750 --> 01:04:31.208

<b>10-0-1-97-200.</b>

107

01:04:31.416 --> 01:04:31.916

<b>Excuse me.</b>

108

01:04:32.125 --> 01:04:33.416

<b>I didn't interrupt you did I?</b>

109

01:04:33.958 --> 01:04:34.083

<b>Okay.</b>

110

01:04:34.083 --> 01:04:34.916

<b>If you don't want to hear your rights</b>

111

01:04:34.916 --> 01:04:36.083

<b>then we're not going to talk about it.</b>

112

01:04:36.333 --> 01:04:38.125

<b>Well an RS197-200 so</b>

113

01:04:38.125 --> 01:04:39.083

<b>you're not going to run back.</b>

114

01:04:39.083 --> 01:04:39.416

<b>Okay.</b>

115

01:04:39.875 --> 01:04:40.875

<b>I'm not going to ask you any questions.</b>

116

01:04:41.166 --> 01:04:41.791

<b>Step over to my vehicle.</b>

117

01:04:42.125 --> 01:04:42.291

<b>Okay.</b>

118

01:04:49.208 --> 01:04:56.250

<b>I'm going to ask you a question.</b>

119

01:04:58.458 --> 01:04:58.541

<b>I'm going to  
ask you a question.</b>

120

01:04:58.541 --> 01:04:59.500

<b>Are you going to pay the fee for it?</b>

121

01:05:01.750 --> 01:05:02.583

<b>The wallet and the purse</b>



122

01:05:02.583 --> 01:05:03.291  
<b>you want to get in there.</b>

123

01:05:03.541 --> 01:05:03.875  
<b>Thank you.</b>

124

01:05:03.875 --> 01:05:04.833  
<b>We're going to get everything done.</b>

125

01:05:05.041 --> 01:05:06.166  
<b>But the search is an actual arrest.</b>

126

01:05:08.916 --> 01:05:10.166  
<b>And what am I doing to arrest you for?</b>

127

01:05:10.458 --> 01:05:11.708  
<b>You're being arrested for trespassing.</b>

128

01:05:12.083 --> 01:05:12.583  
<b>Okay.</b>

129

01:05:12.583 --> 01:05:13.833  
<b>So where was the North</b>

130

01:05:13.833 --> 01:05:14.291  
<b>Crest Pass on the side?</b>

131

01:05:14.291 --> 01:05:14.500  
<b>The North Crest Pass on the side. Okay. Okay. Okay. Okay. Okay. Okay.  
Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. It's  
time.</b>

132

01:05:15.250 --> 01:05:15.458  
<b>Okay.</b>

133

01:05:15.458 --> 01:05:15.791  
<b>Go ahead.</b>

134

01:05:17.583 --> 01:05:19.333  
<b>Were there no trespassers time course?</b>

135

01:05:20.416 --> 01:05:21.750

<b>Explain everything to you about, right</b>

136

01:05:21.750 --> 01:05:22.916

<b>now you're not under Miranda</b>

137

01:05:22.916 --> 01:05:23.958

<b>so I'm not going to use the</b>

138

01:05:23.958 --> 01:05:24.166

<b>phone.</b>

139

01:05:24.458 --> 01:05:24.666

<b>Look.</b>

140

01:05:28.041 --> 01:05:31.500

<b>(unintelligible) Hold on there.</b>

141

01:05:32.666 --> 01:05:35.875

<b>(unintelligible)</b>

142

01:05:36.291 --> 01:05:42.125

<b>You want to shut that off if you want.</b>

143

01:05:42.125 --> 01:05:44.375

<b>Please leave my cameras running.</b>

144

01:05:44.791 --> 01:05:51.916

<b>Please leave my cameras running.</b>

145

01:05:51.916 --> 01:05:52.125

<b>Please leave my cameras running.</b>

146

01:05:52.291 --> 01:05:55.916

<b>I'm not going to do that.</b>

147

01:05:56.791 --> 01:05:58.083

<b>And, don't be designed</b>

148

01:05:58.083 --> 01:05:59.708  
<b>versus making the phone call.</b>

149  
01:06:01.041 --> 01:06:04.583  
<b>Negative. Sorry, I didn't realize you</b>

150  
01:06:04.583 --> 01:06:05.458  
<b>were mounting a B2B.</b>

151  
01:06:05.458 --> 01:06:06.083  
<b>What do you mean?</b>

152  
01:06:07.125 --> 01:06:08.750  
<b>We are just a man of any</b>

153  
01:06:08.750 --> 01:06:09.541  
<b>type of any type of problem.</b>

154  
01:06:11.125 --> 01:06:12.125  
<b>Yeah, this is not like a</b>

155  
01:06:12.125 --> 01:06:14.166  
<b>DMV downtown or something.</b>

156  
01:06:14.375 --> 01:06:15.250  
<b>No, this is a post office,</b>

157  
01:06:15.458 --> 01:06:16.291  
<b>this is a sheriff's office.</b>

158  
01:06:16.291 --> 01:06:17.333  
<b>This is a pure facility.</b>

159  
01:06:17.583 --> 01:06:18.208  
<b>There's no freedom of</b>

160  
01:06:18.208 --> 01:06:20.000  
<b>information to ask to get west here.</b>

161  
01:06:20.708 --> 01:06:22.958  
<b>We need some statements.</b>

162

01:06:24.000 --> 01:06:26.375

<b>That way we have someone from the state</b>

163

01:06:26.375 --> 01:06:27.875

<b>here that's going to press.</b>

164

01:06:29.250 --> 01:06:31.250

<b>And then we're going to have</b>

165

01:06:31.250 --> 01:06:32.375

<b>to probably tow his truck too.</b>

166

01:06:33.291 --> 01:06:34.291

<b>So he's in custody now.</b>

167

01:06:34.541 --> 01:06:35.375

<b>Yeah, tow his truck.</b>

168

01:06:36.125 --> 01:06:37.916

<b>And you sail and see him to get the</b>

169

01:06:37.916 --> 01:06:39.125

<b>statements and the tilt.</b>

170

01:06:39.166 --> 01:06:40.000

<b>And I'll work on that.</b>

171

01:06:40.000 --> 01:06:40.541

<b>That's yours only.</b>

172

01:06:40.750 --> 01:06:41.041

<b>I do not.</b>

173

01:06:41.041 --> 01:06:41.833

<b>So my partner is going</b>

174

01:06:41.833 --> 01:06:43.000

<b>to get the statements.</b>

175

01:06:44.083 --> 01:06:45.916  
<b>Is there any other specific NRS that's</b>

176  
01:06:45.916 --> 01:06:47.500  
<b>applicable as far as it comes to</b>

177  
01:06:48.125 --> 01:06:49.125  
<b>trespassing on the</b>

178  
01:06:49.125 --> 01:06:50.708  
<b>prison or something like that?</b>

179  
01:06:51.083 --> 01:06:52.041  
<b>You guys have a card on you?</b>

180  
01:06:52.625 --> 01:06:53.041  
<b>What's that?</b>

181  
01:06:53.041 --> 01:06:53.958  
<b>Do you have a card on you?</b>

182  
01:06:53.958 --> 01:06:54.166  
<b>Yeah.</b>

183  
01:06:54.458 --> 01:06:55.083  
<b>I'll pull it up and</b>

184  
01:06:55.083 --> 01:06:56.375  
<b>email it right to you.</b>

185  
01:06:56.375 --> 01:06:56.875  
<b>Yeah, all that.</b>

186  
01:06:57.166 --> 01:06:57.375  
<b>Thanks.</b>

187  
01:06:58.125 --> 01:06:59.541  
<b>Because again, every individual that</b>

188  
01:06:59.541 --> 01:07:00.375  
<b>comes on to this property,</b>



189

01:07:00.583 --> 01:07:01.416  
<b>they have to be clear to</b>

190

01:07:01.416 --> 01:07:02.166  
<b>come on to the property.</b>

191

01:07:02.166 --> 01:07:02.416  
<b>Okay.</b>

192

01:07:02.666 --> 01:07:03.791  
<b>And where are they supposed to check in?</b>

193

01:07:03.791 --> 01:07:04.458  
<b>Is it the gate house?</b>

194

01:07:05.125 --> 01:07:06.708  
<b>Actually, we received notice</b>

195

01:07:06.708 --> 01:07:07.500  
<b>through the administration.</b>

196

01:07:08.166 --> 01:07:10.291  
<b>Which would turn the gate house and the</b>

197

01:07:10.291 --> 01:07:11.375  
<b>individual would be notified</b>

198

01:07:11.375 --> 01:07:12.541  
<b>who's coming onto the property.</b>

199

01:07:13.041 --> 01:07:13.166  
<b>Okay.</b>

200

01:07:13.166 --> 01:07:14.541  
<b>That's why you just can't show up and</b>

201

01:07:14.541 --> 01:07:15.708  
<b>just go out and definitely not take</b>

202

01:07:15.708 --> 01:07:16.833  
<b>photos of them.</b>

203  
01:07:16.833 --> 01:07:17.166  
<b>Okay.</b>

204  
01:07:18.041 --> 01:07:21.250  
<b>So who all had contact with him?</b>

205  
01:07:21.250 --> 01:07:22.666  
<b>I'm here as a warden.</b>

206  
01:07:22.958 --> 01:07:23.916  
<b>I'm the warden, so I</b>

207  
01:07:23.916 --> 01:07:25.208  
<b>believe that's why I came down.</b>

208  
01:07:25.208 --> 01:07:27.500  
<b>I'll probably, I think the warden would</b>

209  
01:07:27.500 --> 01:07:29.375  
<b>obviously carry some weight as far as</b>

210  
01:07:29.375 --> 01:07:30.458  
<b>you make contact with him.</b>

211  
01:07:30.458 --> 01:07:30.666  
<b>Yeah.</b>

212  
01:07:30.791 --> 01:07:31.833  
<b>I mean, I'm just saying that you guys</b>

213  
01:07:31.833 --> 01:07:32.916  
<b>don't carry weight as well as you're</b>

214  
01:07:32.916 --> 01:07:33.500  
<b>a Florida property.</b>

215  
01:07:33.708 --> 01:07:35.458  
<b>But if we have, you guys do a statement.</b>

216

01:07:35.833 --> 01:07:36.083

<b>I am.</b>

217

01:07:36.125 --> 01:07:39.125

<b>And then we'll get the, the door going</b>

218

01:07:39.125 --> 01:07:40.333

<b>and then I'll book him.</b>

219

01:07:40.708 --> 01:07:41.791

<b>Did he give you his name?</b>

220

01:07:42.291 --> 01:07:43.958

<b>We have it off of his, we have a wallet</b>

221

01:07:43.958 --> 01:07:45.166

<b>there and then we have a registration</b>

222

01:07:45.166 --> 01:07:45.791

<b>off of that.</b>

223

01:07:45.958 --> 01:07:46.791

<b>Oh, that's beautiful.</b>

224

01:07:46.791 --> 01:07:47.500

<b>Can I get that?</b>

225

01:07:47.500 --> 01:07:48.083

<b>Yeah, for sure.</b>

226

01:07:48.083 --> 01:07:48.625

<b>I'll be notified.</b>

227

01:07:49.041 --> 01:07:49.791

<b>Do you have a second?</b>

228

01:07:50.125 --> 01:07:50.916

<b>So do you have that other</b>

229

01:07:50.916 --> 01:07:52.000  
<b>charge you're talking about?</b>

230  
01:07:52.000 --> 01:07:52.666  
<b>Because I'm going to, I'm</b>

231  
01:07:52.666 --> 01:07:53.833  
<b>going to take them in now.</b>

232  
01:07:55.750 --> 01:08:03.125  
<b>Is there one more card for you?</b>

233  
01:08:03.125 --> 01:08:03.750  
<b>Yeah.</b>

234  
01:12:39.875 --> 01:12:41.000  
<b>Okay.</b>

235  
01:12:41.833 --> 01:12:42.041  
<b>Cool.</b>

236  
01:12:42.541 --> 01:12:42.791  
<b>Cool.</b>

237  
01:12:42.791 --> 01:12:42.875  
<b>Cool.</b>

238  
01:12:42.875 --> 01:12:44.041  
<b>We will do a trespassing.</b>

239  
01:12:44.666 --> 01:12:46.458  
<b>Obstructing for you guys.</b>

240  
01:12:47.000 --> 01:12:47.208  
<b>Right.</b>

241  
01:12:47.208 --> 01:12:48.375  
<b>We would probably need to leave you.</b>

242  
01:12:48.375 --> 01:12:48.625  
<b>Thank you.</b>

243

01:12:49.750 --> 01:12:51.375

<b>You know, obviously he's instructed, he's</b>

244

01:12:51.375 --> 01:12:52.291

<b>obstructing you guys.</b>

245

01:12:52.291 --> 01:12:53.416

<b>You guys are a chief of these officers.</b>

246

01:12:53.750 --> 01:12:54.875

<b>So he's obstructing your</b>

247

01:12:54.875 --> 01:12:56.333

<b>ability to do your work.</b>

248

01:12:57.083 --> 01:12:59.875

<b>So, but if there's another specific kind</b>

249

01:12:59.875 --> 01:13:01.625

<b>of risk, then I need to add that.</b>

250

01:13:02.125 --> 01:13:02.500

<b>So I'm going to take her down to that. Okay. Okay. So, I'm going to take her down to that. Okay.

Okay. So, I'm going to take her down to that. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay. Okay.</b>

251

01:13:02.500 --> 01:13:03.458

<b>So, I'm going to take her down now.</b>

252

01:13:04.000 --> 01:13:04.208

<b>Okay.</b>

253

01:13:04.500 --> 01:13:06.250

<b>So, if you can just give that to him,</b>

254

01:13:06.250 --> 01:13:07.208

<b>then he can call me</b>

255

01:13:07.208 --> 01:13:08.416



<b>because I'm going to go down</b>

256

01:13:08.416 --> 01:13:09.791

<b>and start the paperwork on it.</b>

257

01:13:09.791 --> 01:13:09.916

<b>Okay.</b>

258

01:13:09.916 --> 01:13:10.125

<b>Cool.</b>

259

01:13:10.291 --> 01:13:11.416

<b>But yeah, I mean, this</b>

260

01:13:11.416 --> 01:13:13.041

<b>is, he wants to do an audit.</b>

261

01:13:13.250 --> 01:13:14.708

<b>I don't know what the intentions are.</b>

262

01:13:14.708 --> 01:13:16.125

<b>Obviously, it's probably clear.</b>

263

01:13:16.500 --> 01:13:17.250

<b>However, this is</b>

264

01:13:17.250 --> 01:13:18.625

<b>extremely controlled environment.</b>

265

01:13:18.625 --> 01:13:19.291

<b>I mean, we check in</b>

266

01:13:19.291 --> 01:13:20.750

<b>here before we come in.</b>

267

01:13:20.750 --> 01:13:20.916

<b>Yeah.</b>

268

01:13:20.916 --> 01:13:21.708

<b>So, I don't know what.</b>

269

01:13:22.125 --> 01:13:22.958

<b>If I had to authorize,</b>

270

01:13:23.291 --> 01:13:24.750

<b>we get clear to do a lot.</b>

271

01:13:24.958 --> 01:13:25.166

<b>Right.</b>

272

01:13:25.833 --> 01:13:26.791

<b>We don't have any paperwork</b>

273

01:13:26.791 --> 01:13:27.958

<b>to see if you can do an audit.</b>

274

01:13:28.250 --> 01:13:29.125

<b>So, you hear after violating.</b>

275

01:13:29.125 --> 01:13:31.958

<b>And have you received paperwork before as far as you can? Yes. And have you received paperwork before as</b>

276

01:13:31.958 --> 01:13:33.416

<b>far as, I mean, just from other people?</b>

277

01:13:33.625 --> 01:13:33.750

<b>Yeah.</b>

278

01:13:33.750 --> 01:13:35.291

<b>If they're going to come do an audit and</b>

279

01:13:35.291 --> 01:13:35.916

<b>that's the standard?</b>

280

01:13:36.166 --> 01:13:36.333

<b>Okay.</b>

281

01:13:36.458 --> 01:13:36.583

<b>Yeah.</b>

282

01:13:36.583 --> 01:13:37.916  
<b>If you could put that in there just</b>

283  
01:13:37.916 --> 01:13:38.833  
<b>roughly, you don't have</b>

284  
01:13:38.833 --> 01:13:40.375  
<b>to name names, but are you</b>

285  
01:13:40.375 --> 01:13:42.625  
<b>routinely get requests for an audit?</b>

286  
01:13:43.083 --> 01:13:44.625  
<b>There was no request that was forwarded.</b>

287  
01:13:44.958 --> 01:13:46.750  
<b>This was a surprise, obviously, major</b>

288  
01:13:46.750 --> 01:13:47.541  
<b>disruption of the</b>

289  
01:13:47.541 --> 01:13:48.583  
<b>yard and everything else.</b>

290  
01:13:48.875 --> 01:13:50.291  
<b>So, can you get them written?</b>

291  
01:13:50.666 --> 01:13:50.833  
<b>Yep.</b>

292  
01:13:51.041 --> 01:13:52.333  
<b>And then I'm going to get him going down</b>

293  
01:13:52.333 --> 01:13:52.875  
<b>there so we can get</b>

294  
01:13:52.875 --> 01:13:53.333  
<b>everybody out of the set.</b>

295  
01:13:53.333 --> 01:13:55.291  
<b>And then on the tow, just because it's on</b>

296

01:13:55.291 --> 01:13:56.250  
<b>your guys' property and</b>

297

01:13:56.250 --> 01:13:57.125  
<b>everything, our sergeant</b>

298

01:13:57.166 --> 01:13:58.833  
<b>saying it's probably the plan here if you</b>

299

01:13:58.833 --> 01:14:00.541  
<b>guys call for</b>

300

01:14:00.541 --> 01:14:02.625  
<b>whatever process you normally</b>

301

01:14:02.625 --> 01:14:04.083  
<b>go through to tow cars off your property.</b>

302

01:14:04.875 --> 01:14:05.083  
<b>So...</b>

303

01:14:05.458 --> 01:14:06.500  
<b>They probably don't do that often.</b>

304

01:14:06.875 --> 01:14:07.000  
<b>Yeah.</b>

305

01:14:07.000 --> 01:14:07.208  
<b>Yeah.</b>

306

01:14:08.125 --> 01:14:09.000  
<b>We don't have them to have.</b>

307

01:14:09.000 --> 01:14:10.333  
<b>We don't know how to call one for that.</b>

308

01:14:10.333 --> 01:14:11.041  
<b>We don't have them to have.</b>

309

01:14:11.041 --> 01:14:12.208  
<b>We don't have them to tell at all.</b>

310  
01:14:12.208 --> 01:14:12.833  
<b>But normally we tell</b>

311  
01:14:12.833 --> 01:14:14.000  
<b>people, "Hey, you can't be here."</b>

312  
01:14:14.208 --> 01:14:15.041  
<b>They turn around and go, "Hey."</b>

313  
01:14:15.125 --> 01:14:16.458  
<b>He's in our custody.</b>

314  
01:14:16.708 --> 01:14:17.583  
<b>I would say that we tow</b>

315  
01:14:17.583 --> 01:14:18.916  
<b>it so that way it's safe.</b>

316  
01:14:18.916 --> 01:14:19.000  
<b>Yes.</b>

317  
01:14:19.000 --> 01:14:19.458  
<b>I'm just repeating.</b>

318  
01:14:19.958 --> 01:14:20.166  
<b>Okay.</b>

319  
01:14:21.083 --> 01:14:22.583  
<b>We'll take care of the tow and then he's</b>

320  
01:14:22.583 --> 01:14:23.708  
<b>going to get you some written statements</b>

321  
01:14:23.708 --> 01:14:25.000  
<b>as detailed as possible.</b>

322  
01:14:25.000 --> 01:14:25.125  
<b>And then I'll take him down.</b>

323  
01:14:25.125 --> 01:14:27.791  
<b>That was 207.200.</b>

324  
01:14:27.791 --> 01:14:31.958  
<b>207.200.</b>

325  
01:14:34.125 --> 01:14:35.666  
<b>207.200.</b>

326  
01:14:36.791 --> 01:14:41.208  
<b>Is there any subsection at all?</b>

327  
01:14:41.708 --> 01:14:41.916  
<b>Yeah.</b>

328  
01:14:42.166 --> 01:14:43.625  
<b>Is there a subsection of that address?</b>

329  
01:14:48.708 --> 01:14:48.916  
<b>Yeah.</b>

330  
01:14:49.000 --> 01:14:51.708  
<b>The winter birds.</b>

331  
01:14:52.166 --> 01:14:52.875  
<b>Huh?</b>

332  
01:14:53.291 --> 01:14:54.416  
<b>You're looking on my fire frame.</b>

333  
01:14:55.500 --> 01:14:55.708  
<b>The winter birds.</b>

334  
01:14:56.291 --> 01:14:57.166  
<b>10-0-2-1.</b>

335  
01:14:57.375 --> 01:14:58.625  
<b>207.200.</b>

336

01:14:59.000 --> 01:15:01.083  
<b>1-8-11.</b>

337  
01:15:01.500 --> 01:15:02.166  
<b>There's a land warrant.</b>

338  
01:15:02.666 --> 01:15:03.833  
<b>A building with other things.</b>

339  
01:15:04.333 --> 01:15:04.833  
<b>That's correct.</b>

340  
01:15:05.416 --> 01:15:06.083  
<b>And then there's a beam.</b>

341  
01:15:06.416 --> 01:15:07.791  
<b>Wolf would go to the pool and he'd come</b>

342  
01:15:07.791 --> 01:15:09.250  
<b>to the land for a building.</b>

343  
01:15:09.500 --> 01:15:12.625  
<b>That's just normal trespass road.</b>

344  
01:15:13.666 --> 01:15:13.833  
<b>Stop.</b>

345  
01:15:14.041 --> 01:15:14.416  
<b>It's a trespass.</b>

346  
01:15:15.375 --> 01:15:16.333  
<b>It's a trespass.</b>

347  
01:15:16.625 --> 01:15:17.791  
<b>It's normal trespass.</b>

348  
01:15:18.000 --> 01:15:18.041  
<b>It's normal trespass.</b>

349  
01:15:18.125 --> 01:15:20.041  
<b>If there's anything that's applicable to</b>



350

01:15:20.041 --> 01:15:22.416  
<b>like prison property, you</b>

351

01:15:22.416 --> 01:15:23.166  
<b>know that would be great</b>

352

01:15:23.166 --> 01:15:24.166  
<b>to be able to put on there.</b>

353

01:15:24.166 --> 01:15:24.958  
<b>I'll fight something.</b>

354

01:15:24.958 --> 01:15:26.500  
<b>I mean I'll articulate it but it would be</b>

355

01:15:26.500 --> 01:15:28.250  
<b>good if there's a specific NRS.</b>

356

01:15:29.541 --> 01:15:31.791  
<b>Like disrupt any of the prison</b>

357

01:15:31.791 --> 01:15:33.666  
<b>duties or anything like that.</b>

358

01:15:34.125 --> 01:15:35.750  
<b>You know other states have these because</b>

359

01:15:35.750 --> 01:15:36.291  
<b>we haven't dealt with</b>

360

01:15:36.291 --> 01:15:37.333  
<b>this bullshit very much.</b>

361

01:15:37.750 --> 01:15:37.958  
<b>Yeah.</b>

362

01:15:41.125 --> 01:15:42.416  
<b>Are you hanging out for a minute?</b>

363

01:15:42.583 --> 01:15:43.708  
<b>Yeah I'll be here.</b>

364  
01:15:43.708 --> 01:15:45.375  
<b>Who's doing the statement and everything?</b>

365  
01:15:45.375 --> 01:15:46.875  
<b>I believe the word "nice man."</b>

366  
01:15:47.166 --> 01:15:47.583  
<b>Do you have a card?</b>

367  
01:15:48.166 --> 01:15:48.333  
<b>Yeah.</b>

368  
01:15:54.833 --> 01:15:55.125  
<b>Right on.</b>

369  
01:15:55.125 --> 01:15:55.458  
<b>Thank you brother.</b>

370  
01:15:56.041 --> 01:15:56.583  
<b>You guys don't have a</b>

371  
01:15:56.583 --> 01:15:57.583  
<b>case number by chance do you?</b>

372  
01:15:58.125 --> 01:15:58.916  
<b>I don't have it yet.</b>

373  
01:15:59.416 --> 01:16:00.375  
<b>I think he has it.</b>

374  
01:16:00.625 --> 01:16:00.833  
<b>Okay.</b>

375  
01:16:01.500 --> 01:16:02.166  
<b>But I'll get that.</b>

376  
01:16:02.166 --> 01:16:03.250  
<b>Or actually if you give me my card back</b>

377

01:16:03.250 --> 01:16:04.291

<b>I'll go look on the computer</b>

378

01:16:04.291 --> 01:16:05.708

<b>real quick and get it for you.</b>

379

01:16:36.166 --> 01:16:37.333

<b>Two, two.</b>

380

01:16:37.500 --> 01:16:37.708

<b>Yep.</b>

381

01:16:38.666 --> 01:16:38.875

<b>Yep.</b>

382

01:16:39.250 --> 01:16:44.458

<b>All I have is what was on his plate.</b>

383

01:16:45.166 --> 01:16:46.708

<b>Drew Rybar?</b>

384

01:16:47.583 --> 01:16:48.500

<b>Drew Rybar?</b>

385

01:16:48.583 --> 01:16:49.958

<b>That's just who the registered owner is</b>

386

01:16:49.958 --> 01:16:50.500

<b>so I don't know if</b>

387

01:16:50.500 --> 01:16:51.041

<b>that's going to be him.</b>

388

01:16:51.250 --> 01:16:51.416

<b>Okay.</b>

389

01:16:52.291 --> 01:16:52.875

<b>He's got it.</b>

390

01:16:52.875 --> 01:16:54.166  
<b>He had his wallet on him.</b>

391  
01:16:54.541 --> 01:16:57.125  
<b>So we're going to figure that part out.</b>

392  
01:17:30.750 --> 01:17:36.583  
<b>Okay so we're going to do</b>

393  
01:17:36.583 --> 01:17:37.625  
<b>a little truck shopping.</b>

394  
01:17:37.625 --> 01:17:38.708  
<b>We're going to do a Monday of Trucking.</b>

395  
01:17:39.250 --> 01:17:41.500  
<b>Just make sure when we're riding about</b>

396  
01:17:41.500 --> 01:17:43.000  
<b>how many times you guys have told them.</b>

397  
01:17:44.166 --> 01:17:46.000  
<b>And then you know like maybe something</b>

398  
01:17:46.000 --> 01:17:47.666  
<b>like it's not uncommon that you guys do</b>

399  
01:17:47.666 --> 01:17:48.625  
<b>receive these audits.</b>

400  
01:17:48.625 --> 01:17:49.333  
<b>However they go</b>

401  
01:17:49.333 --> 01:17:51.791  
<b>through the official process.</b>

402  
01:17:52.500 --> 01:17:53.458  
<b>All visitors are required.</b>

403  
01:17:53.791 --> 01:17:54.666  
<b>I mean you guys know</b>

404

01:17:54.666 --> 01:17:55.708

<b>the prison more than I do.</b>

405

01:17:55.916 --> 01:17:58.166

<b>So if you can just clarify that in your</b>

406

01:17:58.166 --> 01:17:59.666

<b>statement a little bit as well as your</b>

407

01:17:59.666 --> 01:18:02.208

<b>boys as far as their contact with him.</b>

408

01:18:02.208 --> 01:18:06.083

<b>Them ignoring all their requests.</b>

409

01:18:06.750 --> 01:18:07.708

<b>Did anybody ask him ID</b>

410

01:18:07.708 --> 01:18:08.750

<b>at all on the property?</b>

411

01:18:09.083 --> 01:18:10.708

<b>Not to my knowledge because I just asked</b>

412

01:18:10.708 --> 01:18:11.958

<b>him what he was saying and</b>

413

01:18:11.958 --> 01:18:12.125

<b>he refused to acknowledge.</b>

414

01:18:12.125 --> 01:18:15.125

<b>I didn't ask him to give me why was he</b>

415

01:18:15.125 --> 01:18:16.333

<b>what was his name or the</b>

416

01:18:16.333 --> 01:18:17.208

<b>purpose of being a cop.</b>

417

01:18:17.208 --> 01:18:18.750  
<b>So we can do failure to identify it too.</b>

418  
01:18:19.125 --> 01:18:19.291  
<b>Yeah.</b>

419  
01:18:19.625 --> 01:18:20.416  
<b>He's required to at</b>

420  
01:18:20.416 --> 01:18:21.333  
<b>least give you a name.</b>

421  
01:18:21.333 --> 01:18:21.541  
<b>Yeah.</b>

422  
01:18:21.708 --> 01:18:21.875  
<b>Right.</b>

423  
01:18:23.083 --> 01:18:24.208  
<b>And then did you guys ask</b>

424  
01:18:24.208 --> 01:18:25.041  
<b>him for his name at all?</b>

425  
01:18:25.416 --> 01:18:26.583  
<b>I did not ask him for his name but I just</b>

426  
01:18:26.583 --> 01:18:27.750  
<b>tried to see why he was here and tried to</b>

427  
01:18:27.750 --> 01:18:29.708  
<b>direct him off the property to building</b>

428  
01:18:29.708 --> 01:18:31.500  
<b>17 over there right down the</b>

429  
01:18:31.500 --> 01:18:32.416  
<b>road to get some information.</b>

430  
01:18:32.750 --> 01:18:32.958  
<b>Okay.</b>

431

01:18:33.250 --> 01:18:33.833

<b>So those three?</b>

432

01:18:34.125 --> 01:18:34.333

<b>Yeah.</b>

433

01:18:34.583 --> 01:18:35.000

<b>Do you want...</b>

434

01:18:36.000 --> 01:18:37.333

<b>And then he can do the...</b>

435

01:18:38.250 --> 01:18:40.083

<b>Well it's not really a citizen's arrest.</b>

436

01:18:40.125 --> 01:18:41.375

<b>Because they're cops.</b>

437

01:18:41.375 --> 01:18:42.875

<b>That's kind of what I'm...</b>

438

01:18:42.875 --> 01:18:44.208

<b>Just he's the complete one.</b>

439

01:18:44.208 --> 01:18:44.416

<b>Yeah.</b>

440

01:18:46.083 --> 01:18:47.541

<b>So this is a really</b>

441

01:18:47.541 --> 01:18:49.125

<b>routine charge that we have.</b>

442

01:18:49.125 --> 01:18:50.625

<b>It's just the state property is a little</b>

443

01:18:50.625 --> 01:18:52.333

<b>bit different but just the statements are</b>

444



01:18:52.333 --> 01:18:53.958  
<b>going to be sufficient and you have</b>

445  
01:18:53.958 --> 01:18:56.250  
<b>obviously total authority over the</b>

446  
01:18:56.250 --> 01:18:57.458  
<b>property so that works for me.</b>

447  
01:18:58.125 --> 01:18:58.875  
<b>And then we'll go from</b>

448  
01:18:58.875 --> 01:19:00.166  
<b>there and then he'll hang out.</b>

449  
01:19:00.166 --> 01:19:00.958  
<b>I'll get those from you and</b>

450  
01:19:00.958 --> 01:19:02.000  
<b>I'll go down and book them.</b>

451  
01:19:02.000 --> 01:19:02.208  
<b>Yeah.</b>

452  
01:19:03.125 --> 01:19:03.375  
<b>Alrighty.</b>

453  
01:19:03.375 --> 01:19:03.833  
<b>Thank you guys.</b>

454  
01:19:04.541 --> 01:19:05.125  
<b>Appreciate you.</b>

455  
01:19:05.125 --> 01:19:05.708  
<b>Any questions?</b>

456  
01:19:07.125 --> 01:19:07.666  
<b>We'll go to the largest...</b>

457  
01:19:14.083 --> 01:19:15.125  
<b>Yeah I'm getting it right now.</b>





**EXHIBIT C**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**DREW J. RIBAR,**  
Plaintiff,

v.

**STATE OF NEVADA ex rel. NEVADA DEPARTMENT OF CORRECTIONS; CARSON  
CITY; DEPUTY JASON BUENO**, in his individual and official capacity; **WARDEN  
FERNANDEIS FRAZIER; SGT. ROBERT SMITH; et al.**,  
Defendants.

**Case No.: 3:24-cv-00103-ART-CLB**

**Plaintiff:** Drew J. Ribar, *pro se*

**Address:** 3480 Pershing Ln., Washoe Valley, NV 89704

**Phone:** (775) 223-7899

**Email:** Const2Audit@gmail.com



**EXHIBIT C**

PLEADING TITLE - I

**Video Footage – Deputy Jason Bueno Body-Worn Camera**

**Filed in Support of Plaintiff's Amended Complaint and Motion for Summary Judgment  
Under Fed. R. Civ. P. 56**

**SUMMARY JUDGMENT RELEVANCE**

Pursuant to **Fed. R. Civ. P. 56(a)**, this exhibit provides **undisputed material evidence** of Defendants' violations of Plaintiff's rights under:

- **U.S. Constitution:** Amendments I, IV, VIII, XIV
- **Nevada Constitution:** Article 1, §§ 1, 6, 8, 9, 18
- **Federal Law:** 42 U.S.C. § 1983; 18 U.S.C. §§ 241–242
- **Nevada Statutes:** NRS 171.1233, 197.200, 199.310, 200.460, 200.310, 200.481, 200.471, 207.190, 205.2715, 205.220

This exhibit complements Exhibits A and B, proving:

1. **Retaliation** for recording in public (*Fordyce v. Seattle*, 55 F.3d 436 (9th Cir. 1995); *Turner v. Driver*, 848 F.3d 678 (5th Cir. 2017))
2. **Unlawful arrest** without probable cause (*Manuel v. City of Joliet*, 137 S. Ct. 911 (2017); *Thompson v. Clark*, 596 U.S. 36 (2022))
3. **Cruel conditions** via heat exposure (*Hope v. Pelzer*, 536 U.S. 730 (2002); *Farmer v. Brennan*, 511 U.S. 825 (1994))
4. **Due process violations** via property seizure (*Mathews v. Eldridge*, 424 U.S. 319 (1976))

- 1        5. **Municipal liability** for policy/custom (*Monell v. Dep't of Soc. Servs.*, 436 U.S. 658  
2        (1978))  
3

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6        **DESCRIPTION**

- 7
- 8        • **Video Recording:** 37 minutes, 1 second of body-worn camera footage from Deputy  
9        Jason Bueno, recorded **August 30, 2022**, at **Northern Nevada Correctional Center**  
10        (NNCC), obtained via discovery in **criminal case No. 22 CR 01231 1C** (*dismissed by*  
11        *order dated [insert date if known]*)  
12
- 13        • **Format:** Submitted on USB per **Local Rule IC 2-2**, with **Notice of Manual Filing**  
14

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16        **KEY LEGAL VIOLATIONS AND SUPPORTING EVIDENCE**

17

18        

Timestamp	Incident Summary	Legal Relevance
19		
20	Sgt. Smith: "Notified deputies" First Amendment retaliation ( <i>Glik v. Cunniffe</i> ,	
21        0:01:10	for "exercising his First	655 F.3d 78 (1st Cir. 2011); <i>Fields v. City of</i>
22        Amendment rights."		<i>Philadelphia</i> , 862 F.3d 353 (3d Cir. 2017))
23	Sgt. Smith: "No 'no	No probable cause ( <i>Hiibel v. Sixth Judicial Dist.</i>
24        0:01:29	trespassing' signs up."	<i>Cl.</i> , 542 U.S. 177 (2004); NRS 207.200)
25	Sgt. Smith: "This is a public	Public forum; arrest invalid ( <i>Reed v. Town of</i>
26        0:01:37	roadway, which it is."	<i>Gilbert</i> , 576 U.S. 155 (2015))
27		
28		

Timestamp	Incident Summary	Legal Relevance
0:02:03	Sgt. Smith: "We want it gone."	Pretextual intent; Monell custom ( <i>Whren v. United States</i> , 517 U.S. 806 (1996))
0:03:34–	Bueno arrives; Frazier:	No warning; Fourth Amendment ( <i>Terry v. Ohio</i> , 392 U.S. 1 (1968))
0:03:49	"Trespassing... remove him."	
0:04:13	Bueno: "Put your hands behind your back."	Unlawful seizure ( <i>Manuel v. City of Joliet</i> , supra; NRS 200.460)
0:05:11	Bueno: "You're being arrested for trespassing."	False arrest ( <i>Thompson v. Clark</i> , supra)
0:05:19–	AC hose redirects air; Plaintiff	Eighth Amendment ( <i>Hope v. Pelzer</i> , supra;
0:05:37	in back, no seatbelt, dry shirt.	<i>Youngberg v. Romeo</i> , 457 U.S. 307 (1982))
0:06:30	"Tow his truck."	Due process violation ( <i>Mathews v. Eldridge</i> , supra; NRS 205.2715)
0:07:14	"Definitely not take photos or whatever."	Retaliation ( <i>Turner v. Driver</i> , supra; NRS 171.1233)
0:07:56	AC hose to driver's seat.	Deliberate indifference ( <i>Estelle v. Gamble</i> , 429 U.S. 97 (1976))
0:08:13	Frazier: "Advocacy groups."	Viewpoint discrimination ( <i>Reed v. Town of Gilbert</i> , supra)
0:10:21–	Window closed, cutting	
0:10:28	airflow.	Cruel conditions ( <i>Farmer v. Brennan</i> , supra)

Timestamp	Incident Summary	Legal Relevance
0:13:12–	Bueno/Frazier: Audit intent, no Retaliation ( <i>Irizarry v. Yehia</i> , 38 F.4th 1282 (10th	
0:13:23	paperwork.	Cir. 2022))
0:15:43	Frazier: "Unauthorized videos."	Mischaracterization ( <i>Fields v. City of Philadelphia</i> , <i>supra</i> )
0:24:55–	Bueno cools himself with AC	Eighth Amendment ( <i>Wilson v. Seiter</i> , 501 U.S.
0:32:36	hose.	294 (1991))
<b>0:33:34</b>	Plaintiff exits, sweating profusely, shirt soaked.	Visual proof of distress ( <i>Youngberg v. Romeo</i> , <i>supra</i> )
<b>0:34:45</b>	Bueno: "Got a little sweaty back there."	Admission of conditions ( <i>Farmer v. Brennan</i> , <i>supra</i> )
0:34:51	Plaintiff: "Trying to hot box me."	Eighth Amendment ( <i>Hope v. Pelzer</i> , <i>supra</i> )
0:35:23	Plaintiff cites <i>Irizarry v. Yehia</i> .	Legal awareness strengthens claim
0:36:02	Plaintiff: "Nobody asked me to identify."	Negates obstruction ( <i>Hiibel v. Sixth Judicial Dist. Ct.</i> , <i>supra</i> )
0:37:01	Bueno: "Get you all dried up..."	Acknowledgment of distress ( <i>Estelle v. Gamble</i> , <i>supra</i> )

*Footnote:* All timestamps are included for completeness; **bolded entries** (0:33:34, 0:34:45) are pivotal visual and verbal admissions. See *Youngberg v. Romeo*, 457 U.S. 307 (1982) (conditions of confinement must not impose undue hardship).



## LEGAL CLAIMS SUPPORTED

1. **First Amendment Retaliation:** Arrest for recording (*Fordyce, Glik, Turner, Fields, Irizarry*; NRS 171.1233)
2. **Fourth Amendment False Arrest:** No probable cause (*Manuel, Thompson, Hiibel*; NRS 200.460, 200.310)
3. **Eighth Amendment Cruel Conditions:** Heat exposure (*Hope, Farmer, Youngberg, Estelle*; NRS 200.481, 200.471)
4. **Fourteenth Amendment Due Process:** Truck towed (*Mathews, Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982); NRS 205.2715, 205.220)
5. **State Torts:** False imprisonment, coercion, malicious prosecution (*Iqbal v. Ashcroft*, 556 U.S. 662 (2009); NRS 197.200, 207.190, 199.310)

## QUALIFIED IMMUNITY ANALYSIS

Defendants' actions violate **clearly established law in the Ninth Circuit:**

- **Recording:** *Fordyce* (1995), *Glik* (2011), *Turner* (2017), *Fields* (2017), *Irizarry* (2022)
- **False Arrest:** *Hiibel* (2004), *Manuel* (2017), *Thompson* (2022)
- **Conditions:** *Hope* (2002), *Farmer* (1994), *Estelle* (1976)

1 Officers' statements (e.g., "*no signs*", "*sweaty back there*") show **knowledge of illegality**,  
2 defeating qualified immunity (*Harlow v. Fitzgerald*, 457 U.S. 800 (1982)).  
3  
4

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5  
6 **AUTHENTICATION**  
7

8 Under **Fed. R. Evid. 901, 1002**, and **28 U.S.C. § 1746**, I, **Drew J. Ribar**, declare under penalty  
9 of perjury that this video from **Deputy Jason Bueno's body camera**, obtained via discovery  
10 (*Case No. 22 CR 01231 1C*), **accurately depicts events on August 30, 2022**, at NNCC.  
11  
12

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13  
14 **DATED:** March 27, 2025

15 **/s/ Drew J. Ribar**

16 Drew J. Ribar, Pro Se

17 3480 Pershing Ln., Washoe Valley, NV 89704

18 (775) 223-7899 | Const2Audit@gmail.com  
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